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**JENKINS & CLAYMAN** 

Eric J Clayman, Esquire 412 White Horse Pike Audubon, New Jersey 08106 (856) 546-9696

IN THE MATTER OF:

Attorney for Debtor

UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF NEW JERSEY

CHAPTER 13 CASE NO. 15-29631 KCF Andrea Smith

Debtor SUPPLEMENTAL CERTIFICATION IN

OPPOSITION TO CERTIFICATION OF

DEFAULT FILED ON BEHALF OF TOYOTA

HEARING DATE: 10/25/2017 at 09:00 AM

I, Andrea Smith, by way of certification hereby state:

1. I am the Chapter 13 debtor, and I am authorized to make this certification.

2. I have carefully reviewed the Certification of Default filed on behalf of Toyota. Please note I have made every payment, and in fact, I have made payments in the last two months. I will make my October payment within 30 days of the date due. The issue involves the alleged extra payment of \$171.45. I do not believe I owe this payment. Specifically, I called Toyota, and the person at Toyota's bankruptcy department told me I was "current" and actually "ahead a little bit" and as such, I stopped paying the extra \$171.45. I would like Toyota and its attorneys to review this matter. If the woman to whom I spoke was correct, that I am current or a little bit ahead, all should be well, and I should just continue to make the payments. If Toyota is convinced I really am behind, I will pay the extra \$171.45.

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I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: 10/17/17 /s/Andrea Smith

Andrea Smith, debtor

## **SERVICE LIST**

## ATTORNEY FOR THE SECURED CREDITOR, TOYOTA MOTOR CORPORATION

Denise Carlon, Esquire KML Law Group, P.C. 216 Haddon Avenue, Suite 406 Westmont, NJ 08108 dcarlon@kmllawgroup.com

## **DEBTOR:**

Andrea Smith 27 Fountain Blvd Burlington, NJ 08016